Montana Department of
ENVIRONMENTAL QUALITY
Judy Martz, Governor

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July 6, 2004

Mr. Peter J. Borowiec, Jr., P.E.
Task Manager – Libby Asbestos Project
CDM Federal Programs Corp.
34 North Last Chance Gulch —Suite 104
Helena, MT 59601

RE: FINAL APPROVAL OF CLASS IV LANDFILL CONSTRUCTION AND UPDATE TO OPERATIONS & MAINTENANCE PLAN
EPA Libby Asbestos Class IV Landfill (Lic. #99)

Dear Mr. Borowiec:

On October 2, 2003, I inspected the EPA Libby Asbestos Class IV landfill during disposal operations for compliance with the Montana Solid Waste laws and rules after clearing the visit with EPA and Volpe Center. I was accompanied while on site by Randy Huffsmith and Scott Supernaugh (CDM), Chuck Jackson and Mike Kar (ER), and Greg Parana (Mactec). While riding in a pickup equipped with a positive-pressure air purifying system, Randy Huffsmith (CDM engineer) and I passed through the support line into the decon zone and entered the level-C exclusion zone to observe operations during disposal of friable asbestos containing material (ACM) from the EPA Superfund emergency response action at the Libby NPL site. Friable ACM is generated during the clean-up from removal of Zonolite insulation and soil conditioners contaminated by tremolite asbestos contained in vermiculite that was mined in Libby.

EPA demonstrated friable ACM disposal operations in the exclusion zone by utilizing the new "misting dome system" for dumping of nonbagged and unwetted vermiculite insulation from a 20-cy sealed vacuum-truck container. Mist was emitted at a constant rate to knock down friable ACM dust within the essentially closed dome system, in combination with two spray hoses that were directed by level-C suited personnel to wet the load from each side as it is dumped into the concrete load-out bunker. Observations and personnel badges indicated that the system appeared adequate to regularly control the emission of friable ACM dust, given this dry load also represented the worst-case scenario that EPA intends to allow during disposal. A front-end loader entered through a freezer-style paneled curtain to pick up the load and tram it to the working face.

Visible emission of friable ACM dust was, however, observed during this pilot demo when the front-end loader dumped its load at the working face where a system of sprinklers broadcast over the disposal area prior to application of required daily cover. A temporary shortage of staff prevented use of the manual spray hose that was installed to mist loads during dumping after they are trammed from the dome to the working face for disposal. In order to avoid such violations, please make sure that enough level-C suited personnel are present within the exclusion zone prior to any disposal of friable ACM. Solutions to this issue were discussed in Mr. Huffsmith's engineering report submitted on October 19, 2003. In addition to the dome,

sprinklers, and manual sprayers, it was also suggested by those on site that a mechanism for the wetting of vacuum truck loads during actual clean-up should further assist in the elimination of friable ACM dust emissions during disposal at the landfill face outside the dome, as required.

Discussion of other items included: (1) expansion of the current landfill cell into a single unit to allow drainage toward what would be the Cell 2 area away from the misting dome and working face; and (2) utilization of the Cell 3 area for disposal of demolition loads to avoid build-up of excessive runoff from the misting tent. We look forward to your submission of engineering plans, specifications, and O&M updates for expansion of the unit operations to achieve these two goals.

On February 19, 2004, EPA submitted the final O&M Plan update, final as-built plans, QA/QC report, and ground-water monitoring report upon completion of construction modifications. These materials are approved as submitted. On February 26, 2004, EPA submitted updated O&M plans for wet weather operations, which were approved by email on March 2, 2004.

Final approval of construction is granted for the EPA Libby Asbestos Class IV unit as currently constructed and operated. Also during periods of active operations, please submit quarterly reports summarizing the outcome and recommendations from the personnel and air monitoring. You may submit the reports to John Podolinsky (406-444-2690), Asbestos Program, at the same address within this Bureau.

Department approval for transferal of the Class IV unit under the Lincoln County Class II Landfill License #99 will follow upon completion and Department approval of the license-area expansion application. As discussed previously, we also anticipate submission of a statistical correlation of Table-I geochemical indicators for the site demonstrating that the new Class IV ground-water monitoring wells intercept the same uppermost aquifer as the existing Class II ground-water monitoring wells. Please submit this information to Michele Fitcher (406-444-3493), who is reviewing the license expansion and associated hydrogeology in our office.

We thank you for your ongoing cooperation and continued fine efforts. If you have any questions or comments, please contact me at the Permitting and Compliance Division, Waste & Underground Tank Management Bureau, Waste Management Section: Voice (406) 444-4725, email *tstepp@state.mt.us* or FAX (406) 444-1374.

Sincerely,

Tim Stepp
Solid Waste Program

Cc: Bob Rennick, CDM Federal, Helena
Jim Christiansen, Superfund Cleanup Coordinator, EPA, Denver
Courtney Zamora, Volpe Center
Ron Anderson, Lincoln County, Libby
Sandy Olsen, DEQ Remediation Division
John Podolinsky, DEQ Asbestos Program
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